

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,

Plaintiff

vs.

WILLIAM-PAUL THOMAS.

Defendant

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CASE NO: 22-CR-00314

DEFENDANT WILLIAM-PAUL THOMAS'
UNOPPOSED MOTION TO CONTINUE PRESENTENCE INVESTIGATION
DEADLINES AND SENTENCING

TO THE HONORABLE JUDGE:

The Defendant in the above styled and numbered cause, WILLIAM-PAUL THOMAS, under the Sixth Amendment to the United States Constitution and Title 18 U.S.C. 3161(h)(8), respectfully moves the Court for an order continuing the Presentence Investigation Deadlines and Sentencing Hearing in this case for fourteen days. In support of this motion, WILLIAM-PAUL THOMAS would show the Court as follows:

I.

The initial Presentence Investigation Report in this case is due on Friday, January 13, 2023. Objections or Notice of No Objections are due by Friday, February 27, 2023. The final Presentence Report is due by Friday, February 10, 2023 and Sentencing is scheduled for Tuesday, February 21, 2023 at 8:30 a.m. Due to an unexpected change in the assigned United States Probation Officer and scheduling availability, the interview with probation is scheduled for January 13, 2023. Therefore, Counsel is requesting additional time to allow for Defendant's Presentence Investigation Report to

be completed and submitted by United States Probation that is currently due no later than Tuesday, January 13, 2023.

A continuance in this matter will afford the Defendant her due process rights under the 6th and 14th Amendment to the United States Constitution.

According to the 6th and 14th Amendments to the United States Constitution, the Defendant prays this Court GRANTS his Motion to Continue Presentence Deadlines and Sentencing.

This Motion for Continuance is not made for purposes of delay, but that justice may be done.

II.

Counsel for the Defendant conferred with United States Probation Officer Nicole Pustejovsky about this motion on January 3, 2023 who is unopposed to this motion.

Counsel for the Defendant conferred with Assistant United States Attorneys Heather Winter and Nicole Lockhart about this motion on January 3, 2023. The government is unopposed to this motion.

WILLIAM-PAUL THOMAS prays that the Court enter an order allowing the Defendant to reset the Presentence Investigation Deadlines and Sentencing Hearing dates in this case and provide a SCHEDULING ORDER to be issued allowing a 14-day extension.

Dated: January 3, 2023

/s/**Monique C. Sparks**

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CERTIFICATE OF SERVICE

I certify that a true and exact copy of the Defendant WILLIAM-PAUL THOMAS' Motion to Continue the Presentence Deadlines and Sentencing was sent via-electronic mail to Heather Winter and Nicole Lockhart, Assistant United States Attorneys as well as Nicole Pustejovsky, United States Probation Officer on the 3RD day of January 2023.

/s/Monique C. Sparks

MONIQUE C. SPARKS